

Exhibit 2

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1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

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4 NEW YORK IMMIGRATION COALITION, ET AL.,

5 Plaintiffs,
6 vs. Case No. 1:18-CF-05025-JMF
7 UNITED STATES DEPARTMENT OF COMMERCE, ET AL.,
8 Defendants.
9 -----

10 Washington, D.C.
11 Wednesday, August 29, 2018
12 Deposition of:
13 DR. JOHN ABOWD
14 called for oral examination by counsel for
15 Plaintiffs, pursuant to notice, at the office of
16 Arnold & Porter, 601 Massachusetts Avenue NW,
17 Washington, D.C., before KAREN LYNN JORGENSEN,
18 RPR, CSR of Capital Reporting Company,
19 beginning at 9:06 a.m., when were present on
20 behalf of the respective parties:

21 Veritext Legal Solutions
22 Mid-Atlantic Region
23 1250 Eye Street NW - Suite 350
24 Washington, D.C. 20005

P R O C E E D I N G S

2 WHEREUPON,

4 VIDEOGRAPHER: Good morning. We're going
5 on the record at 9:06 a.m. on Wednesday August 29,
6 2018. Please note that the microphones are
7 sensitive and may pick up whispering and private
8 conversations. Please turn off all cell phones
9 and place them away from the microphones, as they
10 can interfere with the deposition audio. Audio
11 and video recording will continue to take place
12 unless all parties agree to go off the record.

13 This is Media Unit 1 of the video
14 recorded deposition of Dr. John Abowd taken by
15 counsel for the plaintiff in the matter of the
16 New York Immigration Coalition, et al., v.
17 United States Department of Commerce, et al. This
18 case is filed in the U.S. District Court of the
19 Southern District of New York. This deposition is
20 being held at the law offices of Arnold & Porter
21 located at 601 Massachusetts Avenue Northwest,
22 Washington, D.C. 20001.

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1 My name is Dan Reidy from the firm
2 Veritext Legal Solutions, and I'm the
3 videographer. The court reporter is
4 Karen Jorgenson from the firm Veritext Legal
5 Solutions.

6 I am not authorized to administer an
7 oath. I am not related to any party in this
8 action, nor am I financially interested in the
9 outcome.

10 Also, counsels' appearances will be noted
11 on the stenographic record rather than orally at
12 this time.

13 Will the court reporter please swear in
14 the witness?

15 DR. JOHN ABOWD,
16 called as a witness, and having been first duly
17 sworn, was examined and testified as follows:

18 THE WITNESS: I do.

19 EXAMINATION BY MR. HO:

20 Q Dr. Abowd, before we get started, I just
21 want to confirm something on the record with your
22 counsel.

1 are on the record.

2 BY MS. GOLDSTEIN:

3 Q Dr. Abowd, I think I have just one more
4 question.

5 If you will turn to the last page of the
6 exhibit in front of you Bates marked 1320.

7 A Okay.

8 Q In light of the Census Bureau's analysis
9 of Alternative C versus Alternative D, do you
10 agree that reinstatement of a citizenship
11 question on the 2020 decennial census is necessary
12 to provide complete and accurate data in response
13 to the DOJ request?

14 A No.

15 Q And that is the position of the
16 Census Bureau, correct?

17 A Yes.

18 MS. GOLDSTEIN:

19 Q Thank you, Dr. Abowd.

20 I just want the record to reflect and
21 that plaintiffs -- and I speak to all plaintiffs
22 with respect to this -- are leaving the record

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CERTIFICATE OF REPORTER

3 I, KAREN LYNN JORGENSEN, RPR, CSR, CCR the
4 officer before whom the foregoing deposition was
5 taken, do hereby certify that the witness whose
6 testimony appears in the foregoing deposition was
7 duly sworn by me; that the testimony of said
8 witness was taken by me in stenotype and
9 thereafter reduced to typewriting under my
10 direction; that the said deposition is a true
11 record of the testimony given by said witness;
12 that I am neither counsel for, related to, nor
13 employed by any of the parties to the action in
14 which this deposition was taken; and further, that
15 I am not a relative or employee of any counsel or
16 attorney employed by the parties hereto, nor
17 financially or otherwise interested in the outcome
18 of this action.

Karen Lynn Jorgenson

19

20 KAREN LYNN JORGENSEN, RPR, CCR, CSR

21

Dated this 1st day
22 of September , 2018.